

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

FILED IN OPEN COURT  
U.S.D.C. Atlanta

MAR 13 2013  
*L. Wade Childs*  
James N. Hatten, Clerk  
By: Deputy Clerk

UNITED STATES OF AMERICA

CRIMINAL INDICTMENT

v.

NO.

1:13-CR-077

SHARON PETERS

THE GRAND JURY CHARGES THAT:

Introduction

At all times material to this Indictment, defendant SHARON PETERS was employed by Paragon Systems, Inc., and in that capacity was contracted by the Federal Protective Service to provide security at various United States government facilities, and in doing so wore a uniform and carried a firearm as part of her employment.

COUNT ONE

On or about November 19, 2012, in the Northern District of Georgia, the defendant, SHARON PETERS, did knowingly attempt to distribute a controlled substance, namely more than 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

**COUNT TWO**

On or about November 19, 2012, in the Northern District of Georgia, the defendant, SHARON PETERS, did possess a firearm, that is, a handgun, in furtherance of a drug trafficking crime, that is, the attempted distribution of a controlled substance as alleged in Count One above, all in violation of Title 18, United States Code, Section 924(c) (1) (A) .

**COUNT THREE**

On or about November 29, 2012, in the Northern District of Georgia, the defendant, SHARON PETERS, did knowingly attempt to distribute a controlled substance, namely more than 500 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a) (1) and 841(b) (1) (B) and Title 18, United States Code, Section 2.

**FORFEITURE PROVISION**

1. This indictment in Counts One and Three charges defendant SHARON PETERS with violating Title 21, United States Code, Section 841(a) (1), and upon conviction of such violation, the defendant shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a) (1) any property constituting, or derived from, any proceeds the defendant obtained, directly or

indirectly, as the result of such violation and (2) any of the defendant's property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation.

2. This indictment in Count Two charges defendant SHARON PETERS, with violating Title 18, United States Code, Section 924(c), and upon conviction of such violation the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d), 26 U.S.C. § 5872, and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of the offenses.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of such convicted defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853 to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A

*True*

BILL

*Gentry*  
FOREPERSON

SALLY QUILLIAN YATES  
UNITED STATES ATTORNEY

*[Signature]*  
KIM S. DAMMERS  
ASSISTANT UNITED STATES ATTORNEY  
Georgia Bar No. 425317

*[Signature]*  
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